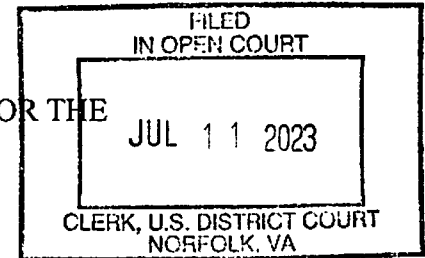


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Norfolk Division



UNITED STATES OF AMERICA

v.

Criminal No. 2:22CR147-05

JASMINE DENEEN CUFFEE,
a/k/a "Jas"

Defendant.

STATEMENT OF FACTS

The United States and the defendant, JASMINE DENEEN CUFFEE, a/k/a "Jas" ("CUFFEE") stipulate that the allegations in Count One of the Superseding Indictment and the following facts are true and correct, and that had the matter gone to trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and competent evidence:

1. From approximately December 2020 and continuing thereafter up to and including November 8, 2022, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, CUFFEE knowingly and intentionally participated in a marijuana and psilocybin trafficking conspiracy with others, including codefendants CORTNEY ALLEN CONLEY, a/k/a "KO" ("C. CONLEY"), RASHAUN MARCQUEZ JOHNSON, a/k/a "Shaun," ("JOHNSON"), DAVIAN MARCELIS JENKINS, a/k/a "DJ" ("JENKINS"), LATEYA CONLEY, a/k/a "Teya" ("L. CONLEY"), COREY MELIC BLACKWELL, a/k/a "Blick" ("BLACKWELL"), JAVAID AKHTAR REED, a/k/a "Vay" ("REED"), KASHEIM BRYANT, ("BRYANT"), KYRON SPELLER, a/k/a "Spazz" ("SPELLER"), TERRANCE SPENCER ALEXANDER, a/k/a "T-Money" ("ALEXANDER"); and AARON HUNTER, a/k/a "ASAP" ("HUNTER"). The

conspiracy ran from approximately January 2020 through November 8, 2022, but CUFFEE did not become involved in the conspiracy until she met C. CONLEY in approximately December 2020.

2. Psilocybin is a constituent of “Magic mushrooms” and was sold by the co-conspirators as “Magic mushrooms” and edibles. Marijuana is a Schedule I controlled substance. Psilocybin is a Schedule I controlled substance.

3. The co-conspirators received quantities of marijuana and psilocybin from a source of supply in California and other states, at times via the United States Postal Service. CUFFEE and her co-conspirators conspired to distribute and possess with the intent to distribute 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana and a mixture and substance containing a detectable amount of psilocybin. During the conspiracy, CUFFEE coordinated with CONLEY to use several of her addresses to receive packages containing marijuana and psilocybin and as “popup” dispensary locations.

4. It was part of the conspiracy that the defendants and co-conspirators would and did play different roles in the conspiracy, taking upon themselves different tasks and participating in the affairs of the conspiracy through various criminal acts. Some of the roles which the defendants and co-conspirators assumed and carried out included, among others, organizer, manager, distributor, packager, advertiser, supplier, and collector. C. CONLEY employed couriers, security, doormen, advertisers, and lower-level retail controlled substance dealers as part of the C. CONLEY DTO. C. CONLEY acted as an organizer, supervisor and manager of the C. CONLEY DTO. JOHNSON acted as security and doorman at “popup” dispensary locations, which would change and “popup” at new locations during the course of the conspiracy. As a doorman, JOHNSON controlled drug customers’ access and entry to the “popup” dispensaries. JOHNSON

also utilized a cellular phone to advertise controlled substances to customers. JENKINS acted as security and engaged in drug sales at “popup” locations. L. CONLEY handled the finances and proceeds from the illegal sales of controlled substances on behalf of the conspiracy, including sending cash out of state while C. CONLEY was a fugitive from law enforcement. L. CONLEY further assisted C. CONLEY when he was a fugitive from law enforcement after the May 13, 2022 double homicide at the Wintercress Way “popup” location. CUFFEE sought out and rented apartments that served as “popup” locations for the conspiracy. CUFFEE further assisted C. CONLEY when he was a fugitive from law enforcement after the May 13, 2022 double homicide at the Wintercress Way “popup” location. CUFFEE also received packages sent via USPS containing controlled substances on behalf of C. CONLEY. REED acted as a manager and security for various popup locations. SPELLER acted as security for various “popup” locations and helped establish the Wintercress Way “popup” shop. SPELLER also assisted C. CONLEY when he was a fugitive from law enforcement by renting a vehicle and driving C. CONLEY to Georgia after the May 13, 2022 double homicide at the Wintercress Way “popup” location. ALEXANDER acted as a doorman and security for the C. CONLEY DTO. BLACKWELL acted as a partner to C. CONLEY in 2020 and 2021 at the Providence Road “popup” location, delivered marijuana belonging to C. CONLEY to an unindicted coconspirator, and sent the surveillance videos that captured the May 13, 2022 double homicide at the Wintercress Way “popup” shop to C. CONLEY in June 2022. BLACKWELL assisted C. CONLEY in reestablishing a “popup” shop utilizing multiple Airbnb locations after the May 13, 2022 double homicide at the Wintercress Way “popup” shop. HUNTER worked as security and in sales of controlled substances for C. CONLEY.

5. The co-conspirators established makeshift “popup” marijuana and psilocybin dispensaries at various locations throughout Hampton Roads, including apartments on

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Providence Road and Wintercress Way in Chesapeake, Virginia. The locations often move or “popup” at new locations to avoid detection by law enforcement, would-be robbers, and burglaries. The apartments at Providence Road and Wintercress Way were set up as a makeshift dispensaries for the sale and distribution of controlled substances, including marijuana and psilocybin. CUFFEE and C. CONLEY coordinated to establish the Wintercress “popup” dispensary, and the apartment was set up as a makeshift dispensary for the sale and distribution of controlled substances, including marijuana and psilocybin. CUFFEE was listed on the lease for the Wintercress apartment.

6. Co-conspirators advertised the dispensaries, including the Providence Road and Wintercress Way “popup” dispensaries, through social media platforms to obtain customers, including through the application Telegram.¹ Co-conspirators were armed throughout the course of the conspiracy to protect the controlled substances and proceeds from the sale of controlled substances at the “popup” dispensary locations. The Wintercress Way “popup” dispensary was equipped with multiple interior-mounted Ring cameras, which were positioned to monitor points of entry and drug sales where cash proceeds were dropped in a secure drop box following transactions.

7. On May 13, 2022, two individuals attempted to rob the Wintercress Way “popup” dispensary. Within the apartment at the time of the attempted robbery were five individuals: JOHNSON, who was working security; C. CONLEY, who was the leader and organizer; JENKINS, who was engaged in the sale and distribution of quantities of marijuana and psilocybin; and two other individuals.

¹ Telegram is a cloud-based instant messaging service. The service also provides optional end-to-end encrypted chats and video calling, VoIP, file sharing and several other features.

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8. At approximately 3:50 p.m. on May 13, 2022, two armed subjects wearing ski masks displayed handguns and forced their way into the Wintercress Way “popup” dispensary. As the two subjects entered the residence, they were met with armed resistance from JOHNSON and C. CONLEY. C. CONLEY was armed with a .45 caliber handgun which he brandished and discharged at the two subjects. JOHNSON was armed with a Glock 9mm semi-automatic pistol, which he brandished and discharged at the two subjects. Gunfire was exchanged with rounds entering neighboring residences. One of the subjects fell dying in the foyer of the residence and the second subject was repeatedly shot with a large caliber handgun multiple times, immobilizing his arms as he attempted to reach for the door handle to flee the residence. Both subjects were left dying in the foyer blocking the front door of the apartment. JENKINS took a firearm from one of the subjects and pistol-whipped the subject as he lay dying in the foyer. JOHNSON, C. CONLEY and JENKINS fled the apartment. CUFFEE was not present at the Wintercress “popup” dispensary during the shootout, and she learned of the shootout afterwards.

9. C. CONLEY fled from law enforcement until he was apprehended on November 8, 2022. C. CONLEY later returned to the Hampton Roads region to reestablish a “popup” dispensary in Virginia Beach, at an address located on Newtown Arch. CUFFEE assisted C. CONLEY while he was on the run with renting the Newtown Arch apartment. Other codefendants, including SPELLER and BRYANT, assisted C. CONLEY in establishing the Newtown Arch. “popup” dispensary.

10. Over the next several months, law enforcement executed a series of search warrants at residences associated with co-conspirators. On May 27, 2022, the investigative team executed a search warrant at CUFFEE’s residence on Magnolia Run Circle in Virginia Beach. Within the residence, the investigative team recovered CUFFEE’s cellphone, a pink SCCY 9mm

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semi-automatic pistol, a magazine containing 13 rounds of ammunition, and a plastic OXO popup container consistent with containers recovered from the Wintercress “popup” dispensary.

11. On November 8, 2022, law enforcement conducted surveillance at the Newtown Arch “popup” dispensary. The investigative team observed BRYANT arrive at the location. The investigative team further observed multiple suspected customers coming and going from the “popup” dispensary with bags of suspected marijuana. Members of the investigative team ordered C. CONLEY and BRYANT to come out of the apartment. C. CONLEY attempted to flee by jumping from a window and was apprehended by investigators. BRYANT ignored commands from law enforcement and remained inside the residence for an extended period of time. After negotiations, BRYANT exited the apartment. A search warrant was secured for the residence. BRYANT was detained pending the execution of the search warrant and found in possession of two cellular devices and a black leather gun holster.

12. The “popup” dispensary located at Newtown Arch was a two-bedroom, one bathroom apartment on the second floor of a multifamily structure. The apartment was purposed for the sale and distribution of controlled substances with folding tables set up in the bedrooms, consistent with the setup of the Wintercress “popup” dispensary. Quantities of marijuana and psilocybin were recovered from the “popup” dispensary. Law enforcement also recovered a Glock 9mm semi-automatic pistol and a Glock 23 .40 caliber semi-automatic pistol underneath couch cushions inside the “popup” dispensary. BRYANT had previously brought both Glock firearms into the residence to protect the controlled substances and proceeds.

13. The parties agree that the quantities of controlled substances involved in the conspiracy attributable to the defendant as a result of her own conduct and the conduct of other

conspirators reasonably foreseeable to the defendant are at least 100 kilograms of marijuana and a mixture and substance containing a detectable amount of psilocybin.

14. Chesapeake and Virginia Beach are located within the Eastern District of Virginia.

15. The acts taken by the defendant, JASMINE DENEEN CUFFEE, in furtherance of the offenses charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law. The defendant acknowledges that the foregoing statement of facts is a partial summary of the case and does not describe all of the defendant's conduct relating to the offenses charged in this case, nor does it identify all of the persons with whom the defendant may have engaged in illegal activities.

Respectfully submitted,

Jessica D. Aber
United States Attorney

By:


Megan M. Montoya
Assistant United States Attorney

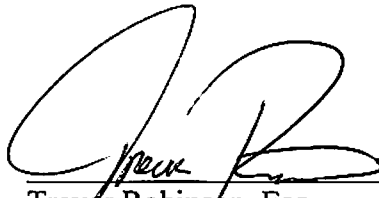
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After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, JASMINE DENEEN CUFFEE, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



JASMINE DENEEN CUFFEE
Defendant

I am counsel for JASMINE DENEEN CUFFEE. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.



Trevor Robinson, Esq.
Attorney for JASMINE DENEEN CUFFEE

8/14/23
JAC